

constructive fraudulent transfer, and (4) breach of fiduciary duty. The grounds for this motion are detailed in the attached and incorporated Memorandum in Support of Motion to Dismiss for Lack of Subject Matter Jurisdiction or, in the Alternative, for Summary Judgment on All Counts of Plaintiff's First Amended Complaint (the "Memorandum").

Based on the foregoing and for the reasons set forth in the Memorandum, Defendants respectfully ask the Court to grant their Motion to Dismiss for Lack of Subject Matter Jurisdiction or, in the Alternative, for Summary Judgment on All Counts of Plaintiff's First Amended Complaint.

Dated: September 28, 2021.

Respectfully submitted,

By: /s/ Lawrence G. Scarborough

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CERTIFICATE OF SERVICE

I, Lawrence G. Scarborough, hereby certify that, on September 28, 2021, a true and correct copy of the foregoing Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction or, in the Alternative, for Summary Judgment on All Counts of Plaintiff's First Amended Complaint was filed electronically via the Court's ECF filing system. This document is available for viewing and downloading from the ECF system and electronic notification has been sent to all counsel of record.

/s/ Lawrence G. Scarborough